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MEMO ENDORSED

March 23, 2023

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VIA ECF ONLY

Hon. Colleen McMahon
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: LM Insurance Corp. v. United Specialty Ins. Co.
1:23-cv-2353
Our File: 40604


Dear Hon. McMahon:

Our office was just retained to represent United Specialty Insurance Company ("USIC") in the above noted matter. We respectfully request an extension of time to answer the Complaint up to and including May 5, 2023, and an extension of time to complete and file the Initial Civil Case Management Plan up to and including May 12, 2023. The answer is currently due April 11, 2023, and the Initial Civil Case Management Plan is now due April 20, 2023.

We request this time due to previously scheduled commitments and the Passover Holiday. This is our first request for an extension. Counsel for Plaintiff has consented to our request provided that USIC agrees to waive personal jurisdictional defenses--a request with which we have agreed.

We thank the Court for its courtesies.

Very truly yours,



Sherri N. Pavloff

cc:

VIA ECF:

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